RECEIVED

### BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

POSTAL BATE CONTROLLED HOFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS L. PAUL LOETSCHER TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC. (MPA/USPS-T41-7)

The United States Postal Service hereby files the response of witness L. Paul Loetscher to the following interrogatory of the Magazine Publishers of America, Inc.: MPA/USPS-T41-7, filed on November 20, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Brian M. Reimer

Attorney

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3037 Fax –5402 December 4, 2001

## RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS L. PAUL LOETSCHER TO INTEROGATORY OF MAGAZINE PUBLISHERS OF AMERICA. INC.

#### MPA/USPS-T41-7.

Please refer to Table 1 below and USPS-LR-J-114, Table 2. Using the data collected to produce USPS-LR-J-114 or the best data available, please enter the percentage of weight entered at each facility by zone. For example, if 80 percent of Destination Bulk Mail Center (DBMC) pounds is entered in Zones 1&2 and the remaining 20 percent is entered in Zone 3, enter 80 percent in the row titled "DBMC" and the column titled "1&2" and 20 percent in the column titled "3". Please also describe the data and methods you used to populate Table 1.

Table 1. Percentage Distribution of Entry Facility Pounds by Zome

Entry Facility	DSCF	DADC	Zone						
			182	3	4	5	6	7	8
Origin Associate Office (OAO) in Service Territory of Destination Sectional Center Facility (DSCF)									
DSCF			<u> </u>						
OAO in Service Territory of Destination Area Distribution Center (DADC)		-							
Origin Sectional Center Facility (OSCF) in Service Territory of DADC									
DADC						<u> 1</u>		<u> </u>	
OAO in Service Territory of Destination Bulk Mail Center (DBMC)									
OSCF in Service Territory of DBMC									
OADC in Service Territory of DBMC									
DBMC									
Origin Bulk Mail Center (OBMC)			1						
OADC Not In Service Territory of DBMC									
OSCF Not In Service Territory 81 BBMC 8F DADC									
OAO Not In Service Territory of DBMC or DADC									

# RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS L. PAUL LOETSCHER TO INTEROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.

#### **RESPONSE:**

The data collected to produce USPS-LR-J-114 provides entry point and container destination ZIP code for sampled containers. However, postal zone is calculated based on the entry point of the piece and the destination of the piece, not the container. The destination information collected for USPS-LR-J-114 applies only to the container. Thus, the information requested by this interrogatory cannot be obtained from the USPS-LR-J-114 data. I am unaware of any data collected by the Postal Service that could be used to produce the information requested.

### DECLARATION

I, L. Paul Loetscher, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

L PAUL LOETSCHER

Dated: December 4, 2001

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Brian M. Reime

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3037 Fax –5402 December 4, 2001